



November 06, 2014

Elizabeth A. Rolando
Chief Clerk, Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701

Please find enclosed the comments of the American Coalition of Competitive Energy Suppliers ("ACCES"), in response to the Illinois Commerce Commission's Notice of Inquiry regarding retail electric market issues filed on September 30, 2014, General Docket Case No. 14-NOI-01. Two additional copies of this set of comments have been made available to the Chief Clerk in the Chicago Office and to the Office of Retail Market Development.

Please do not hesitate to contact me with any questions or concerns regarding our Comments.

Sincerely,

Antonio Soruco
Regulatory Consultant
American Coalition of
Competitive Energy Suppliers

Director, Regulatory & Legislative Affairs
P.R. Quinlan Associates Inc.
1012 14th Street NW, Suite 1106
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Enclosure

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission)	
On Its Own Motion)	
)	14-NOI-01
Notice of Inquiry regarding retail)	
electric market issues)	

Please find below the comments of the American Coalition of Competitive Energy Suppliers ("ACCES"), in response to the Illinois Commerce Commission's ("ICC" or "Commission") investigation at General Docket Case No. 14-NOI-01, regarding the Commission's Notice of Inquiry ("NOI") on retail electric market issues. The comments below focus primarily on providing suggestions as well as offering ACCES' resources and tools on the topic of enhancing consumer education in Illinois.

ACCES is a group of competitive retail natural gas and electricity suppliers committed to helping consumers better understand and take advantage of the benefits of energy choice and electric competition.¹ As an organization, ACCES is solely focused on developing and delivering consumer education resources, in partnership with public service commissions, consumer advocates, utilities, and other suppliers. Several of our members are active retail electric suppliers (RES) in Illinois.

ACCES greatly appreciates the Commission's call for action to increase consumer education, including heightened visibility of the Commission's retail electric education website, PlugInIllinois.org. It is critical to help consumers understand the value of energy choice and to recognize that potential savings is only one among multiple potential benefits. Ultimately, we believe consumer education is about positioning and empowering consumers to make choices that best meet their individual needs and preferences. An educated consumer base which understands the full range of energy choices available and can make informed decisions is vital to strengthening the overall energy market in Illinois.

Below we provide suggestions on the type of consumer educational content that the ICC should consider hosting on the PlugInIllinois.org website along with responses to questions #1 and #2 from the Consumer Education topic of the NOI.

Consumer educational content for PlugInIllinois.org

ACCES is committed to working with private and public stakeholders to strengthen the retail energy market in Illinois, and believes providing even-handed, transparent education on energy choice to consumers is crucial to this effort. It is vital to provide consumers the tools and knowledge they need for an effective energy shopping experience. ACCES strongly appreciates

¹ ACCES's current membership includes Great Eastern Energy, IGS Energy, Infinite Energy, Santanna Energy Services, SouthStar Energy Services, and Energy Services Providers, Inc. d/b/a Illinois Gas & Electric.

and supports the current consumer content that the ICC has made available on the PlugInIllinois.org website, including content like: “What Are Your Choices?”; “Municipal Aggregation”; “FAQ”; “Glossary of Terms”; “Understanding the Utility's Electric Supply Price”; “the Switching Process”; and “Energy Assistance”.

ACCES would further add to this list of content to include user friendly tools and resources such as a “Myths vs. Facts” page that answers consumers’ most common questions or concerns about shopping or switching from one provider to another. In addition, the Commission should include a section that focuses on how a consumer can analyze an RES offer, in order to provide the consumer the opportunity to gather as much reliable information as they can about the RES before committing.

ACCES has developed a variety of resources, including the resources mentioned above as well as a series of consumer-friendly videos. These resources are available not only to consumers directly on our website, but are also available for use by state public utility commissions, consumer advocates, and other approved organizations. ACCES’s efforts are solely focused on consumer education, and do not include commercial or marketing activities. Our resources and tools are available with all of the ACCES branding stripped from the materials to the commissions’ websites, upon request.

Suggestions on the content development of consumer education materials

It is critical that language be judicious and prudent with regard to the savings a consumer can expect from switching to a supplier. The messages should deliver to customers that choice has great value beyond savings, even as important as savings are and should be. A vibrant marketplace of choices will include other value-added products and services, like fixed or variable prices, time-of-use pricing, renewable energy options, and energy efficiency audits.

ACCES provided responses to questions #1 and #2 from the Consumer Education topic of the NOI below.

1. Do you recommend changes and/or supplements to the Commission’s retail electric education website, PlugInIllinois.org?

To further streamline the consumer’s shopping experience on the PlugInIllinois.org website, the Commission should consider adding a “Sign Up for This Particular Offer” link as well as include a “View All Offers” link, under each Retail Electric Suppliers’ (RES) listing on the PlugInIllinois.org website, giving online electric shopping customers both the ability to access and evaluate all current offers by all RES and a more direct link to online enrollment services with a preferred RES. The Pennsylvania Public Utility Commission recently implemented similar enhancements to their PAPowerSwitch.com website on October 21, 2014.² Please view their website as an example.

² Commonwealth of Pennsylvania, Pennsylvania Public Utility Commission - Secretarial Letter: Addition of “Sign Up for This Offer” Functionality and the Inclusion of a “View All Offers” Link on www.PAPowerSwitch.com to Enhance Online Enrollment for Shopping Customers Choosing an Electric Generation Supplier. 10/21/2014.

In addition, the Commission should consider providing consumers the ability to further define their search. More specifically, the Commission should provide a filter option that enables consumers to search for RES by the following criteria: length of the contract; the price (low – high or high - low); renewable electricity offerings; or by alphabetic order of the RES' company names (from A-Z or Z-A). Adding filter options will further streamline the shopping experience for consumers, by more quickly exposing the options they need to meet their energy demands.

2. Do you propose additional ways to increase traffic to PlugInIllinois.org?

ACCES suggests a comprehensive social media campaign, making use of social media platforms: like Twitter, Facebook, and YouTube. These can be very effective tools that would not only enable the ICC to expand and increase its audience, but also to continuously engage and inform customers with the latest consumer educational updates and relevant consumer information coming from the PlugInIllinois.org and the ICC websites. Examples may include tweeting about new educational materials that have been recently posted on the PlugInIllinois.org website or the ICC website (such as tweeting a message on Twitter or writing a message on Facebook regarding a new consumer educational video that is now available for viewing). It is important to remember, however, that social media is best used judiciously. In our experience, social media is most useful as a tool to inform consumers generally about their options as well as how to shop, rather than as a platform for informing consumers about specific plan details or potential rate savings.

Other methods can include direct outreach (e.g., mailing campaigns, webinars, workshops, etc.) to inform Illinois consumers that they can “shop” for their electricity online at the PlugInIllinois.org website. To support this effort the ICC could partner with other organizations dedicated to consumer education on choice, to share ideas, tools, and resources that could be made available in order to carry out any or all of the educational initiatives mentioned above.

Conclusion

ACCES appreciates and commends the Illinois Commerce Commission's dedication to further improving and expanding consumer education in Illinois. We strongly believe that robust consumer education is vital to the long-term success of the marketplace.

We look forward to continuing this discussion with interested parties regarding advancing electric choice in Illinois for the benefit of all consumers.

Please do not hesitate to contact us with any questions or concerns regarding our comments.

Respectfully submitted,



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CC: ACCES Member Companies (Great Eastern Energy, IGS Energy, Infinite Energy, Santanna Energy Services, SouthStar Energy Services, and Energy Services Providers, Inc. d/b/a Illinois Gas & Electric)